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September 14, 2022

VIA ECF

Hon. Cathy L. Waldor, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Sun Chemical Corporation v. American Home Assurance Company, et al.
Civil Action No. 2:20-cv-6252 (SRC-CLW)

Dear Judge Waldor:

We write to you on behalf of Plaintiff, Sun Chemical Corporation (“Sun Chemical”), and with the consent of Defendants, American Home Assurance Company and National Union Fire Insurance Company of Pittsburgh, Pa. (in its own right and as successor-in-interest to Landmark Insurance Company) (“Defendants”), to request a one week adjournment of the case management conference currently scheduled for next Monday the 19th at 10:30 A.M.

Meet and confers, as well as a substantial production of documents by Sun Chemical have continued but, at our request for a number of reasons, the meet and confer scheduled for today needed to be postponed until next week. While counsel for Defendants offered and we accepted a 9:00 A.M. meet and confer on Monday, that would give us no time (before the currently scheduled conference) to tee up any remaining issues for discussion with the Court.

Therefore, we suggested and counsel for Defendants has consented to a one-week adjournment of the conference so that we can prepare a response to various discovery issues raised by Defendants and pare down any issues which we may need to present to the Court.

It is, therefore, requested that the conference be rescheduled for September 26th or any other available time slot during that week.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Martha N. Donovan'.

Martha N. Donovan

cc: All counsel of record via ECF

